



13B  
RECEIVED  
DEC 21 1999

December 17, 1999

Mr. Gary Lipsius  
New Jersey Department of Environmental Protection  
Division of Responsible Party Site Management  
Bureau of State Case Management  
401 East State Street  
CN 028  
Trenton, NJ 08625

**SUBJECT: SUBMITTAL OF REMEDIAL ACTION REPORT ADDENDUM NO. 2  
CK WITCO CORPORATION, PERTH AMBOY PLANT CLEANUP  
NJDEP CONTAMINATED SITE LIST NUMBER NJD002165561**

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Dear Mr. Lipsius:

Enclosed for your review and approval are documents that comprise Addendum No. 2 of our Remedial Action Report (RAR) for CK Witco's Perth Amboy, NJ facility submitted to NJDEP in December 1998. A previous Addendum was submitted to NJDEP in July 1999 to document remedial activities performed after submittal of the RAR and present our proposed Classification Exception Area (CEA), Natural Groundwater Remediation Proposal, and Deed Notice for the facility. Addendum No. 2 has been prepared to document additional remedial activities conducted by CK Witco at the facility since our submittal of the RAR Addendum.

On September 16, 1999, NJDEP issued comments on the previous Addendum related to the draft Deed Notice. Enclosure 1 presents a copy of the comment letter, which requested demarcation of PCB contamination areas that exceed NJDEP's unrestricted use direct contact soil criteria (PCB concentration greater than 0.49 mg/kg). Our proposed Deed Notice demarcated areas with engineering controls covering soils with PCB concentrations in excess of the site-specific cleanup criterion of 2 mg/kg. As we reviewed historic data to respond to NJDEP's comment, we discovered two areas of concern with PCB soil concentrations exceeding 2 mg/kg not addressed during previous remedial actions. One area was located along the eastern boundary of the property adjacent to our administrative parking lot and security fence; the other area was situated in the northern portion of our property adjacent to our rail spur and gate access. CK Witco provided verbal notification to NJDEP of the two areas and elected to install engineering controls (asphalt caps) to control exposure to PCB contamination based upon discussions with the Department.

Mr. Gary Lipsius  
December 17, 1999  
Page 2

In October 1999, Foster Wheeler Environmental, our consultant for RAR activities, evaluated the two areas of concern and developed engineering sketches and details for the placement of engineered asphalt covers. Enclosure 2 contains their transmittal of the cover details to us. You will note that their transmittal referenced the NJDEP-approved Work Plan and management of excavation wastes in accordance with Department and USEPA requirements.

CK Witco installed the engineered asphalt covers at the two areas of concern between November 4 and 22, 1999. IT Corporation, our contractor for RAR activities, installed the covers in accordance with the NJDEP-approved Work Plan at the locations identified by Foster Wheeler Environmental. Enclosure 3 contains IT Corporations letter report for the field activities, including as-built conditions and asphalt documentation.

IT Corporation collected samples from excavated spoils on November 16, 1999 and submitted them for PCB analysis and waste characterization to 21<sup>st</sup> Century Environmental, an NJDEP-certified laboratory. Enclosure 4 contains the results of the waste characterization analysis and the manifest for disposal of spoils at Grows Landfill in Pennsylvania. The low concentration of total PCBs in the waste characterization sample facilitated disposal at Grows Landfill in accordance with Department and USEPA requirements.

On December 7, 1999 CK Witco submitted a Revised Deed Notification to NJDEP. Enclosure 5 contains a copy of the submittal. The Revised Deed Notification responded to the Department's September 16, 1999 comment letter by demarcating areas in exceedance of NJDEP's unrestricted use soil cleanup criterion. The revision also demarcated the two areas concern where CK Witco installed engineered asphalt caps. Revised Deed Notice text was included with the submittal for Department review and approval.

With this submittal of Addendum No. 2, CK Witco satisfies requirements of the September 10, 1985 "Stipulation of Settlement" as amended in the "Second Amendment to the Stipulation of Settlement, " dated January 12, 1993. CK Witco has conducted all work in accordance with the NJDEP-approved Work Plan and has satisfactorily addressed NJDEP's comments to date. Enclosure 6 presents CK Witco's certification letter to this effect.

Mr. Gary Lipsius  
December 17, 1999  
Page 3

CK Witco respectfully requests that the Department conclude its review of the RAR and issue a restricted No Further Action (NFA) determination so that we may file the Deed Notice with Middlesex County and initiate compliance activities proposed in the July 1999 RAR Addendum. We appreciate your cooperation and guidance to date and hope we can conclude this matter shortly. If you have any questions, feel free to call me at 203-552-2408.

Sincerely,

A handwritten signature in black ink, appearing to read "S.D. Kohlase", written over the printed name.

Stephen D. Kohlase



DCC

CE file 600-597-10.14 (Complete submittal with all att's) **FOR ALL**  
~~M. Pittignano w/ revised deed notice and Fig. B-2 (Att. who has not yet been added)~~

J. Raspa- ditto

Perth Amboy

S. Weber- ditto

FWENC

P. Missal- ditto

Middlebury Law Department

*Done  
12/20  
C.C.*

December 17, 1999

Mr. Gary Lipsius  
New Jersey Department of Environmental Protection  
Division of Responsible Party Site Management  
Bureau of State Case Management  
401 East State Street  
CN 028  
Trenton, NJ 08625

*G. N. [Signature]*  
*12/17/99*

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**CK Witco Corporation**  
Benson Road  
Middlebury, CT 06749  
(203) 573-2000

**CK Witco Corporation**  
One American Lane  
Greenwich, CT 06831  
(203) 552-2000



Mr. Gary Lipsius  
December 17, 1999  
Page 2

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Sincerely,



Stephen D. Kohlhasse

**ENCLOSURE 1**

**NJDEP COMMENT LETTER ON REMEDIAL ACTION REPORT ADDENDUM  
AND DRAFT DEED NOTICE  
SEPTEMBER 16, 1999**



State of New Jersey

Christine Todd Whitman  
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.  
Commissioner

2394 321 632

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

SEP 16 1999

Mr. Stephen Kohlhasse, Site Manager  
Witco Corporation  
One American Lane  
Greenwich, CT 06831

Dear Mr. Kohlhasse:

Re: Witco Chemical Corporation, Perth Amboy, Middlesex County Facility

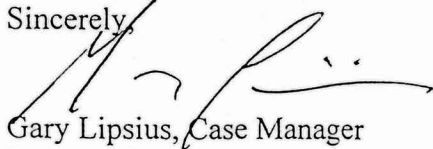
As you are aware, NJDEP is currently reviewing the Remedial Action Report (RAR) Addendum (July 1999). This addendum was submitted in response to NJDEP's comments transmitted to Witco regarding the Remedial Action Report dated November 1998.

NJDEP requires that, prior to the granting of a restricted No Further Action (NFA) determination, Witco must execute and submit an appropriately completed Deed Notice to the Middlesex County. Accordingly, Witco submitted a draft Deed Notice to NJDEP with the RAR Addendum for NJDEP's approval. As a result of NJDEP's review of the draft Deed Notice, NJDEP has determined that the figures submitted as part of the draft Deed Notice depicting the extent of contamination will require revision and re-submission to NJDEP prior to approval. Specifically, Figures B-2.1 through 2.5 depict areas of the site where engineering controls have been implemented at the site where soil contamination exceeds NJDEP's Non-Residential Direct Contact Soil Cleanup Criteria. However, N.J.A.C. 7:26C-1.3 and N.J.S.A. 58:10B-1 require that the Deed Notice demarcate areas of contamination that exceed NJDEP's unrestricted use (i.e. residential) direct contact soil cleanup criteria. Although Figures B-2.1 through 2.5 should be retained as part of the Deed Notice since these figures demarcate areas where engineering controls have been implemented, an additional drawing is required that will depict areas of concern at the site where contamination exceeds the unrestricted use soil cleanup criteria.

Mr. Stephen Kohlhasse  
Witco Corporation  
Page 2 of 2  
09/15/99

Accordingly, within 30 Calendar days from the date of receipt of this letter, Witco should submit the revised Deed Notice as set forth above. Subsequent to NJDEP approval of the draft Deed Notice, Witco shall execute and file the deed notice with Middlesex County consistent with N.J.A.C. 7:26C. In the interim, please feel free to contact me for any reason at 609-984-0955.

Sincerely,



Gary Lipsius, Case Manager  
Bureau of State Case Management

- c. Andrew Marinucci, NJDEP/BEERA  
David Kaplan, NJDEP/BGWPA  
Andrew Park, USEPA RCRA Program

**ENCLOSURE 2**

**SKETCHES AND PAVING DETAILS FOR PCB AREAS OF CONCERN  
FOSTER WHEELER ENVIRONMENTAL, OCTOBER 29, 1999**



# FOSTER WHEELER ENVIRONMENTAL CORPORATION

October 29, 1999  
1908-99X-021

Mr. Stephen Kohlhasse  
CK Witco Corporation  
One American Way  
Greenwich, CT 06831-2559

SUBJECT: SKETCHES AND PAVING DETAILS FOR PCB AREAS OF CONCERN  
CK WITCO PERTH AMBOY, NJ FACILITY  
PURCHASE ORDERS 690-11819

Dear Mr. Kohlhasse:

Enclosed for your use are three sketches with plan and cross-sectional depictions of asphalt cover systems for identified areas of concern at the Perth Amboy, NJ facility. These sketches were generated based upon our site visit and discussions on Wednesday, October 27. Following your request, Foster Wheeler Environmental generated the enclosed sketches, which will be used by your construction contractor, to guide placement of a suitable asphalt cover over PCB areas of concern. It is our understanding that PCB excavation activities will be conducted in accordance with the NJDEP-approved Work Plan and the construction contractor will implement health & safety, regulatory compliance, and waste management plans accordingly. Since there are PCBs present in surface soils that will be removed as part of cover placement, we anticipate that containerization, characterization, and disposal of wastes will be performed in accordance with NJDEP and USEPA requirements. We understand that you do not foresee the need of our services during cover system installation for oversight or inspection.

Concurrent with cover system installation, Foster Wheeler Environmental will update the draft Deed Notice figure sent to CK Witco on October 8, 1999 to reflect additional areas with engineering controls. This figure can then be forwarded to NJDEP to satisfy their comments on the Deed Notice and allow them to proceed with issuance of a No Further Action determination for the site. We understand that we will generate a letter report addendum for the new asphalt covers after installation is complete and your construction contractor provides us with complete documentation, including waste disposal manifests.

As discussed during the site visit, this work represents a change to our existing scope of work. Foster Wheeler Environmental will issue a change order request after identified activities are complete for your approval. If you have any questions or need additional information, please call me at (973) 597-7039.

Very truly yours,

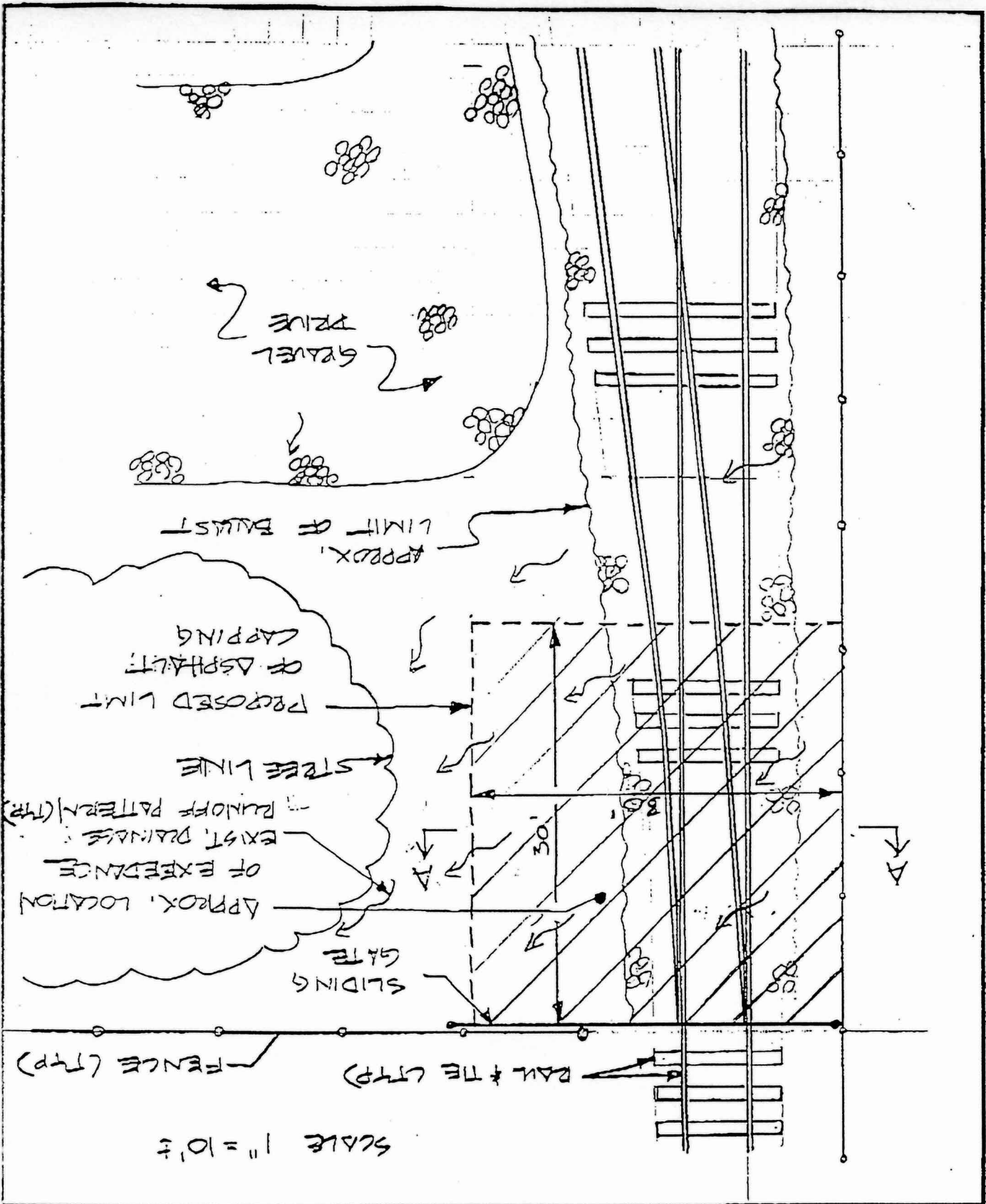
Steven B. Weber, P.E.  
Project Manager

Enclosure

cc: L. Haymon  
M. Junghans







SUBJECT RAIL SLIDING AREA OF CONCERN

PROJECT AREA OF CONCERN MITIGATION

CLIENT WINDO

CHKD. BY DATE

BY MLL DATE 10/24/89

FOSTER WHEELER ENVIRONMENTAL CORPORATION

UCL 29 1999 13:10 FK FOSTER WHEELER ENV 510 057 1433 10 5120000220047150 F10020

SHEET 1 OF 3  
DEPT. NO.  
OFFS. NO.

# FOSTER WHEELER ENVIRONMENTAL CORPORATION

BY MWT DATE 10/29/99

SHEET 2 OF 3  
DEPT. NO. \_\_\_\_\_

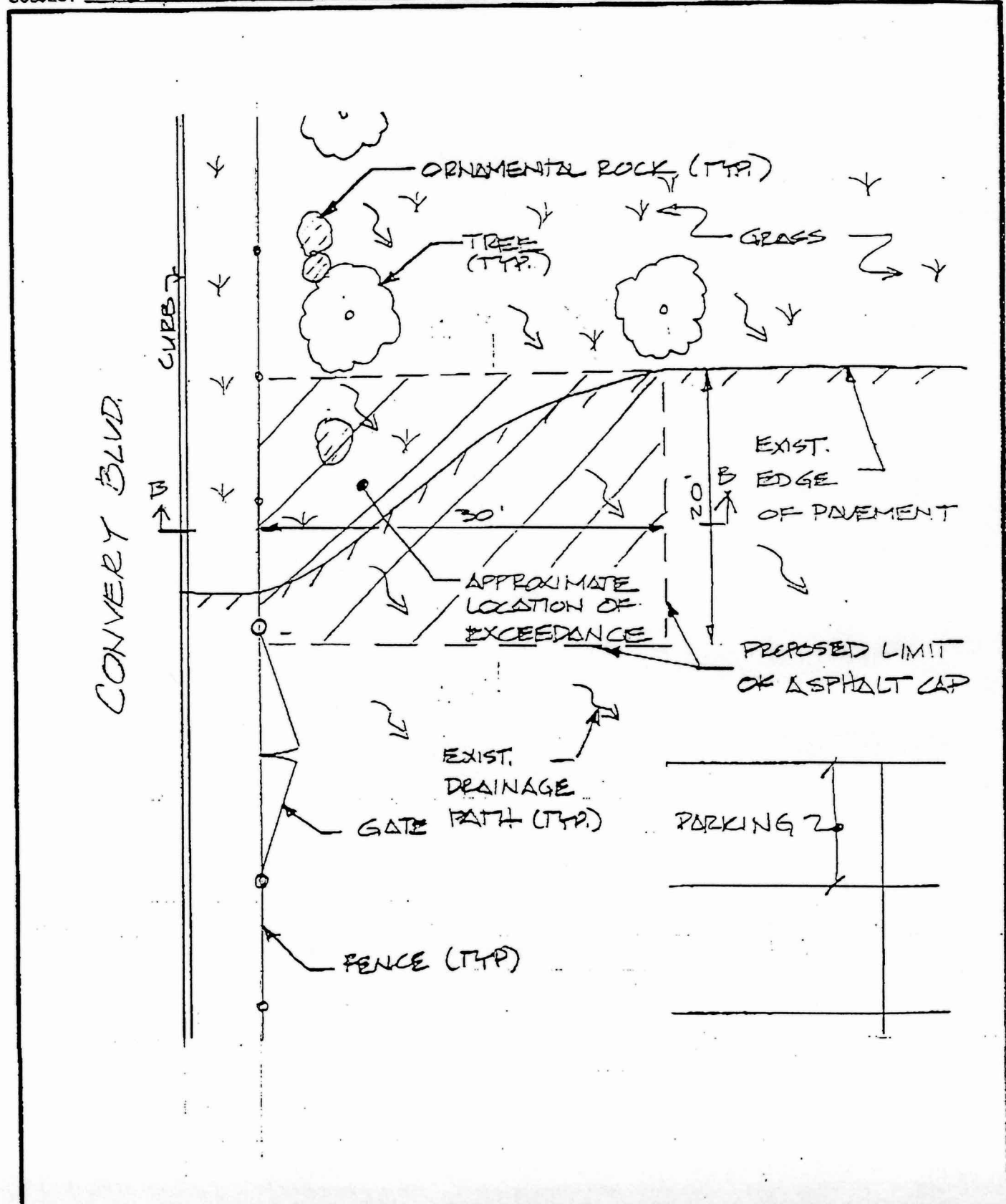
CHKD. BY \_\_\_\_\_ DATE \_\_\_\_\_

OFS NO. \_\_\_\_\_

CLIENT WTRD

PROJECT AREA OF CONCERN MITIGATION

SUBJECT CONVEY PARKING AREA OF CONCERN

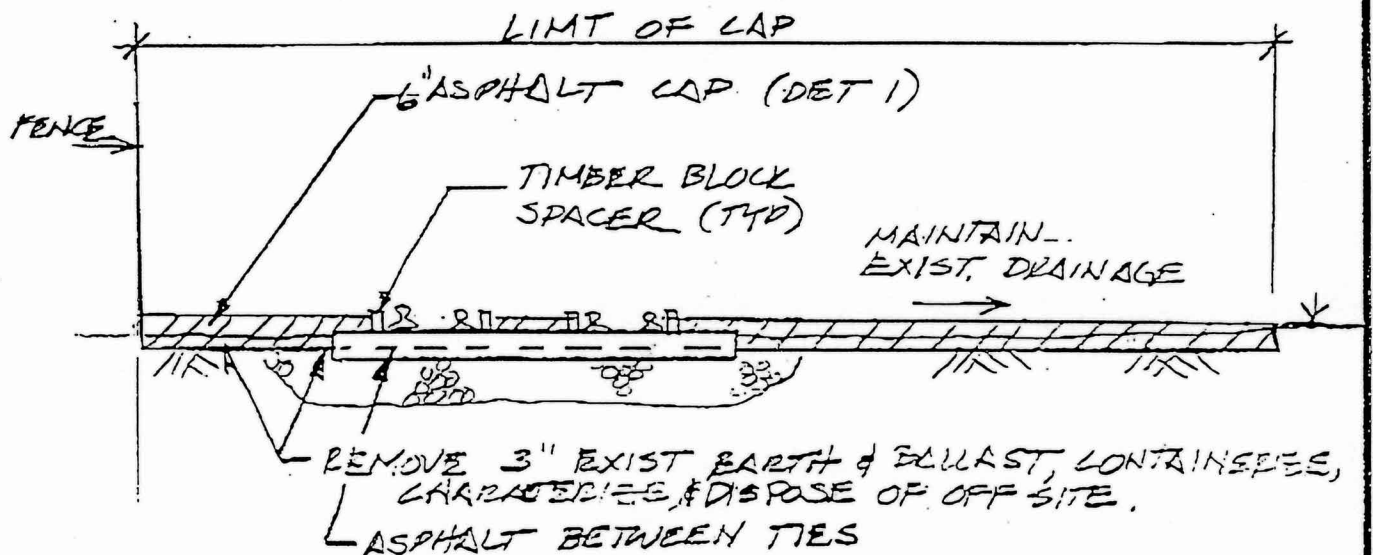


## FOSTER WHEELER ENVIRONMENTAL CORPORATION

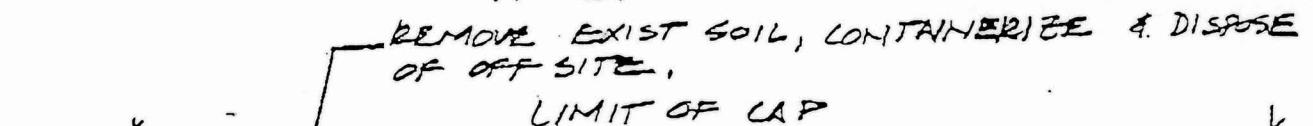
BY MWJ DATE 10/29/99SHEET 3 OF 3

CHKD. BY \_\_\_\_\_ DATE \_\_\_\_\_

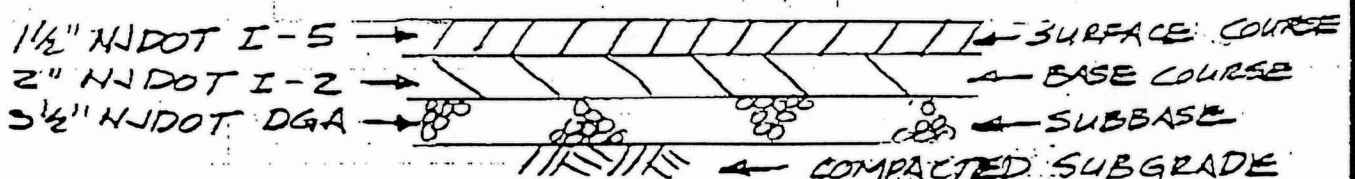
OFS NO. \_\_\_\_\_ DEPT. NO. \_\_\_\_\_

CLIENT WITCOPROJECT AREA OF CONCERN MITIGATIONSUBJECT SECTIONS & DETAILSSECTION A-A

N.T.S.

SECTION B-B

N.T.S.

DETAIL 1

N.T.S.

**ENCLOSURE 3**

**LETTER REPORT FOR INSTALLATION OF ASPHALT COVERS  
IT CORPORATION, NOVEMBER 22, 1999**

- **LETTER REPORT**
- **AS-BUILT CONDITIONS**
- **ASPHALT DOCUMENTATION**



200 Horizon Center Blvd.  
Trenton, New Jersey  
609-584-8900

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November 22, 1999

Witco Corporation  
One American Lane  
Greenwich, CT 06831-2559  
Attn: Mr. Steve Kohlase

**Subject: Asphalt Covers for the PCB Areas of Concern  
CK Witco Perth Amboy, New Jersey Facility**

Dear Mr. Kohlase:

IT Corporation Inc. (IT) is pleased to submit the closure documentation for the construction of Asphalt Covers over the PCB areas of concern at the CK-Witco facility in Perth Amboy, New Jersey.

IT was retained by CK-Witco to perform the work outlined in Foster-Wheeler's letter (with attachments) to Witco dated October 29, 1999. The scope of work consisted of asphalt capping at two locations at the Perth Amboy Plant. The two cap areas are clearly delineated in Foster Wheeler's 29 October letter and were staked out in the field by Foster Wheeler personnel. Shallow soil excavation and removal activities were performed at both cap locations but only to accommodate the required asphalt cap thickness. Record drawings of the work completed are attached to this letter. The work was performed between November 4<sup>th</sup> and November 22<sup>nd</sup>, 1999.

On November 4, 1999, IT mobilized personnel (a Project Engineer, a Lead Operator and a Field Technician) and equipment (Cat 516 backhoe, vehicles and tools) to perform the required scope of work. The first cap area to be addressed was in the front parking lot of the Perth Amboy Plant along the Convery Boulevard fenceline. IT used a small backhoe to remove the existing asphalt from the area delineated by Foster-Wheeler. The material removed consisted of 2 layers of asphalt over an aggregate sub-base. IT removed 6 to 7 inches of the material; both layers of asphalt and a portion of the sub-base. No subsurface soil was removed. The material was placed in a roll-off and hauled to an asphalt recycler, S. D. G. Aggregate, Inc., located in Cateret, New Jersey. Approximately 12 yards of material was generated.

The second asphalt cap was to be constructed along the rail line entering the plant immediately adjacent to the rail access gate. In the area just outside of the railbed limits IT personnel utilized the excavator to remove existing vegetation and about 3 inches soil. Within the railbed itself IT personnel performed hand excavation to remove 3 inches of ballast and soil between the ties and between 4 and 5 inches of ballast and soil outside of the ties. During the removal activity care was taken to grade the overall area to drain away from the tracks. Excavated material was placed in a roll-off and subsequently sampled for transportation and disposal. A 5-point composite sample was collected from the approximately 16 cubic yards of soil and ballast in the roll-off and submitted to 21<sup>st</sup> Century Environmental located in Bridgeport, New Jersey for analysis. Twenty-first Century analyzed the sample for Total PCBs using Method 8081 the and found less than 1 ppm in the sample. It is anticipated that soil in the roll-off box will be transported to Waste Management, Inc.'s GROWS facility in southeastern Pennsylvania for disposal.

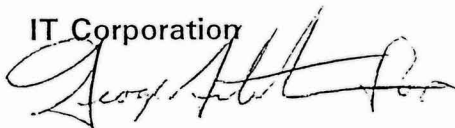
IT retained Kistler Paving to perform the asphalt cap placement over the excavated areas. On November 19, 1999, IT and its asphalt subcontractor mobilized to the site. Work began in the parking lot area of concern. IT placed and compacted a minimum of 2½ inches of dense graded aggregate. 2 inches of Base Course bituminous concrete was then placed and rolled followed by 1½ inches of Top Course bituminous concrete.

At the area of concern adjacent to the railroad gate, IT placed and compacted approximately 2½ inches of dense graded aggregate. This sub-base was blended into the existing ballast in this area as typical railroad ballast does provide a suitable sub-base for the asphalt layer. Bituminous concrete was placed over the prepared sub-base and compacted per the specification. It should be noted that the areas between the rails were compacted with a hand-tamper.

If you have any questions please contact me at (609) 584-6822 or George Arbutina at (609) 588-6338.

Sincerely,

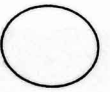
IT Corporation



Kelly Fagan  
Project Engineer

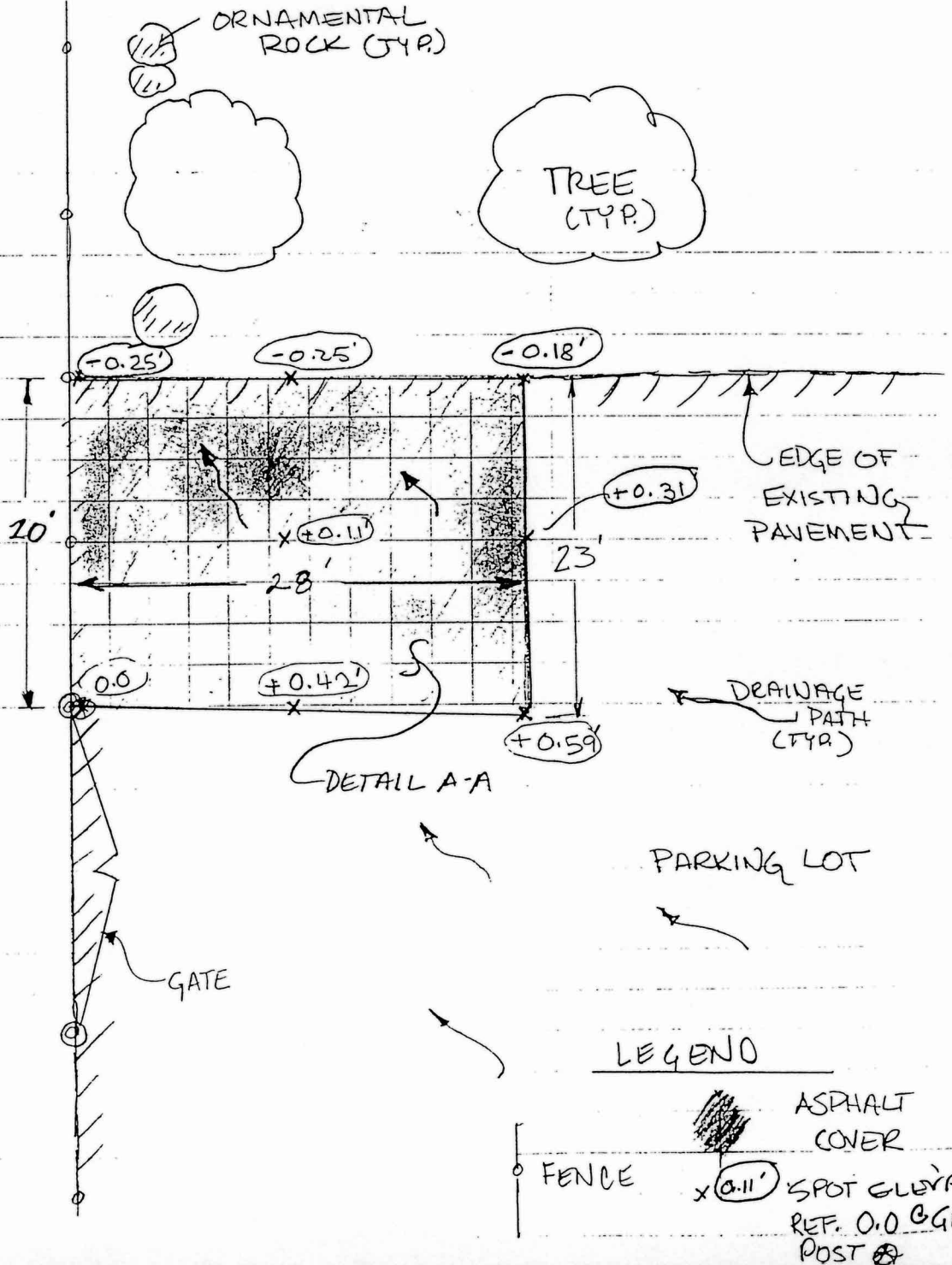
Attachments

Cc: G. Arbutina, IT



By KAF Date 11/22/99 Subject PCB-AREAS OF CONCERN Sheet No. 1 of 3  
Chkd. By \_\_\_\_\_ Date \_\_\_\_\_ CK Witco Perth Amboy Proj. No. \_\_\_\_\_  
.25 in. X .25 in.

CONVEY BLVD



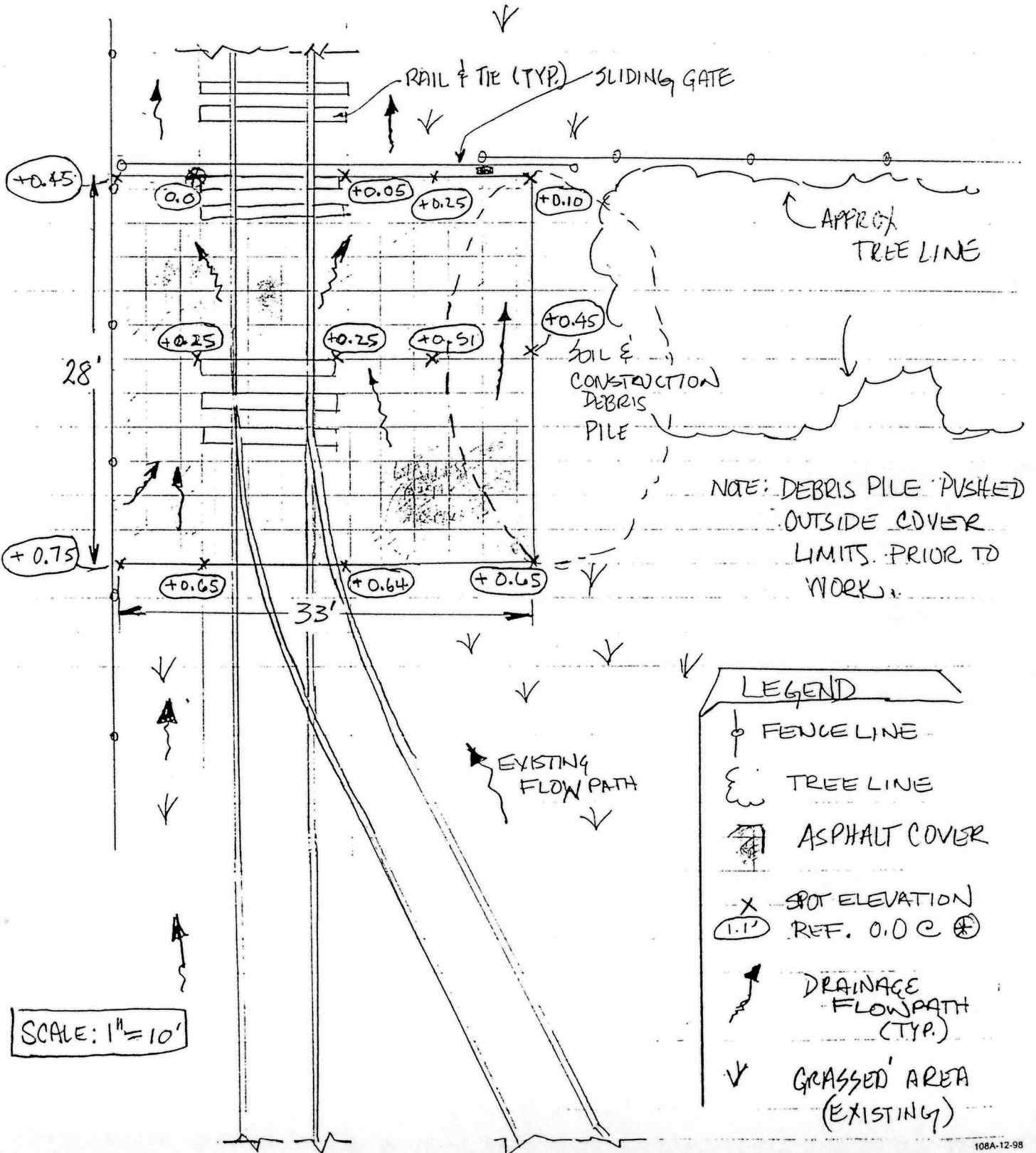


PCB- AREAS OF CONCERN

By KAF Date 11/22/99 Subject ASPHALT COVER Sheet No. 2 of 3

Chkd. By \_\_\_\_\_ Date \_\_\_\_\_ CK WITCO - PERTH AMBOY Proj. No. \_\_\_\_\_

.25 in. X .25 in.



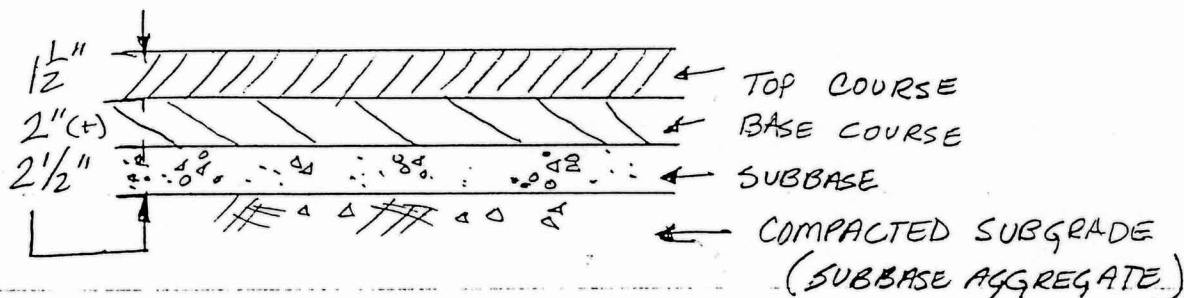


By KAF Date 11/28/99 Subject PCB-AREAS OF CONCERN Sheet No. 3 of 3  
Chkd. By \_\_\_\_\_ Date \_\_\_\_\_ CK MITCO - PERTH AMBOY Proj. No. \_\_\_\_\_

.25 in. X .25 in.

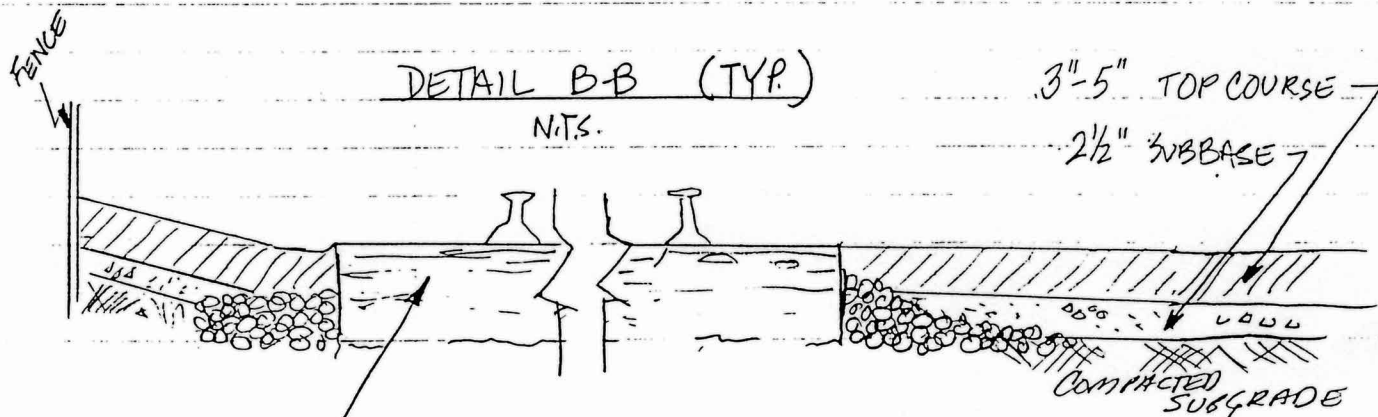
DETAIL A-A (TYP.)

N.T.S.



DETAIL B-B (TYP.)

N.T.S.



BETWEEN TIES 3" BALLAST REMOVED &  
PLACED FOR COMPACTED SUBGRADE.  
3" TOP COURSE PLACED BETWEEN TIES  
TO TOP OF TIES.

**THERMAL BURNS FROM CONTACT WITH HOT  
LIQUID, INHALATION AND EYE IRRITATION  
HAZARDS FROM HYDROGEN SULFIDE GAS**

**SOLD  
TO**

DELIVER  
TO

DATE		TARE:		CUSTOMER NO.	JOB NO.	CUSTOMER P.O./CONTRACT NO.	TICKET NO.
11/19/19		12:15P		4193			
F.O.B. PLANT		F.O.B. JOB		ZONE	ZONE LOCATION		METHOD OF PAYMENT
<input type="checkbox"/>		<input type="checkbox"/>					
PRODUCT				TRUCKER	TRUCK NO.	UNIT PRICE	NET PRICE
W&B COMMERCIAL BASE					441		
LBS	GROSS WEIGHT	TARE WEIGHT	NET WEIGHT	TONS		DELIVERY CHARGE	
	31500	15120	16380	8.17			
KGS	GROSS WEIGHT	TARE WEIGHT	NET WEIGHT	MEGA GRAMS		SUBTOTAL	
	4269.144	2059.312	2209.832	7.4		TAX	
DAILY PRODUCT TONS						TOTAL	
8.17						TOTAL FOR JOB	
REC'D. BY				WEIGHED BY			
[Signature]				B.L.			

When ordered to cross curb-line we do so at your risk and will not be responsible for broken walks, driveways, etc.

CUSTOMER'S COPY

**HAZARD WARNING**

THERMAL BURNS FROM CONTACT WITH HOT  
LIQUID; INHALATION AND EYE IRRITATION  
HAZARDS FROM HYDROGEN SULFIDE GAS

No. 074638



FOOT OF CROWS MILL ROAD  
KEASBEY, N.J.  
08832  
(732) 738-4222

SOLD  
TO

RISTLER PAVING INC.  
SPRING, NJ

91-07-000

DELIVER  
TO

P. J. P.

DATE		TARE: 11/19/99		CUSTOMER NO.	JOB NO.	CUSTOMER P.O./CONTRACT NO.	TICKET NO.
11/19/99		TIME OUT: 2:18 PM		4353			
F.O.B. PLANT		F.O.B. JOB		ZONE	ZONE LOCATION	METHOD OF PAYMENT	
<input type="checkbox"/>		FOB <input type="checkbox"/>					
PRODUCT				TRUCKER	TRUCK NO.	UNIT PRICE	NET PRICE
COMMERCIAL TOP					McG	UNIT	
L B S	GROSS WEIGHT	TARE WEIGHT	NET WEIGHT	TONS		DELIVERY CHARGE	
	34850	15120	19740	5.57			
K G S	GROSS WEIGHT	TARE WEIGHT	NET WEIGHT	MEGA GRAMS		SUBTOTAL	
	5812.231	2356.317	3455.913	3.954		TAX	
DAILY PRODUCT TONS						TOTAL	
REC'D. BY <i>[Signature]</i>				WEIGHED BY B. G.		TOTAL FOR JOB	

When ordered to cross curb line we do so at your risk and will not be responsible for broken walks, driveways, etc.

CUSTOMER'S COPY

**HAZARD WARNING**  
**THERMAL BURNS FROM CONTACT WITH HOT**  
**LIQUID, INHALATION AND EYE IRRITATION**  
**HAZARDS FROM HYDROGEN SULFIDE GAS**

No. 074610



FOOT OF CROWS MILL ROAD  
 KEASBEY, N.J.  
 08832  
 (732) 738-4222

<b>SOLD TO</b>	11-15-10
	11-15-10
<b>DELIVER TO</b>	11-15-10
	11-15-10

DATE		TARE: 11-15-10		CUSTOMER NO.	JOB NO.	CUSTOMER P.O./CONTRACT NO.	TICKET NO.
11-15-10		TIME OUT: 11-15-10		4343	1		
F.O.B. PLANT		F.O.B. JOB		ZONE	ZONE LOCATION	METHOD OF PAYMENT	
<input type="checkbox"/>		<input type="checkbox"/>					
PRODUCT				TRUCKER	TRUCK NO.	UNIT PRICE	NET PRICE
100 COMMERCE TOP							
L B S	GROSS WEIGHT	TARE WEIGHT	NET WEIGHT	TONS		DELIVERY CHARGE	
	34960	15120	19840				
K G S	GROSS WEIGHT	TARE WEIGHT	NET WEIGHT	MEGA GRAMS		SUBTOTAL	
	5857.340	2356.310	3501.030			TAX	
DAILY PRODUCT TONS						TOTAL	
REC'D BY				WEIGHED BY		TOTAL FOR JOB	

When ordered to cross curb line we do so at your risk and will not be responsible for broken walks, driveways, etc.

CUSTOMER'S COPY

**S.D.G. AGGREGATE, INC.**

340 ROOSEVELT AVENUE

P.O. BOX 64

CARTERET, NJ 07008

Frank  
or Dana

No 17806 (732) 541-1140

DELIVERED TO IT Corp.

Witco Perth Amboy

TIME \_\_\_\_\_ DATE 11-19-99

TRUCKMAN Nappy

LICENSE NUMBER \_\_\_\_\_

MATERIAL 1Ld Asphalt

CUBIC YARDS 15 YRDS

TONS Pd CASH \$100.00

RECEIVED BY \_\_\_\_\_

**WASTE CHARACTERIZATION SAMPLE RESULTS  
AND WASTE DISPOSAL MANIFEST**

**ENCLOSURE 4**



PCB DATA ANALYSIS SHEET  
1B

SAMPLE NO.

RR#1

Lab Name: 21ST CENTURY ENVIRONMENTAL

Contract: \_\_\_\_\_

Project No.: \_\_\_\_\_

Site: \_\_\_\_\_

Location: \_\_\_\_\_

Group: \_\_\_\_\_

Matrix: (soil/water) Soil

Lab Sample ID: G8049

Sample wt/vol: 10 (g/mL) g

Lab File ID: D8160.D

Level: (low/med) LOW

Date Received: 11/16/99

% Moisture: 15

decanted: (Y/N): N

Date Extracted: 11/22/99

Concentrated Extract Volume: 10 (ml)

Date Analyzed: 11/23/99

Injection Volume: 2.0 (uL)

Dilution Factor: 1

GPC Cleanup: (Y/N) N

pH: \_\_\_\_\_

CAS No.	Compound	MDL	Result	mg/Kg	Q
	AROCLOR 1018	0.29			U
	AROCLOR 1221	0.29			U
	AROCLOR 1232	0.29			U
	AROCLOR 1242	0.29			U
	AROCLOR 1248	0.29	0.31		
	AROCLOR 1254	0.29			U
	AROCLOR 1260	0.29	0.25		J

J = Detected below method detection limit

U = Not Detected

TO

STEVE WEBER

CUSTOMER: IT CORP  
ADDRESS: 200 HORIZON Center  
TELEPHONE: 609-584-6822  
PROJECT: WIDE AREA NETWORK  
PROJECT MANAGER: L. HEDSTADT / K. Fagan  
PROJECT LOCATION: 9 STATE: NJ  
P.O. NUMBER: \_\_\_\_\_

TURNAROUND (INDICATE WORKING DAYS, CONFIRM WITH LAB): 1 2 7 14 21 OTHER: \_\_\_\_\_

DELIVERABLES (PLEASE CIRCLE): REDUCED / TIER I / TIER II / ECRA / CLP / RESULTS ONLY

OTHER: \_\_\_\_\_

FAX RESULTS TO: \_\_\_\_\_

PCB SOIL MATRIX  
5-point composite  
From Rolloff  
(AFTER excavation  
work completed)  
RR (30x30)

NUMBER OF CONTAINERS

ANALYSIS	METHOD
VOLATILE ORGANICS	
SEMI VOAS (BNA'S)	
PESTICIDES/POB'S	
PCPB'S	
BTEX	
TPH-PETROLEUM HYDROCARBONS	
CORROSIVITY	
IGNITABILITY	
FLASHPOINT	
REACTIVITY	
TOC	
TCMP METALS	
TCMP VOLATILE ORGANICS	
TCMP SEMI VOAS (BNA'S)	
TCMP PEST/HERB	
PRIORITY POLLUTANT METALS (13)	
MSL METALS (23)	
CYANIDE	
OIL AND GREASE	

### ADDITIONAL ANALYSIS

[illegible]

Relinquished By: Kelly Fagan

Daw                      Turner

WHITE  
LAB COPY

YELLOW  
TOMER COPY

Received By:

D-4

Yin

11/14/99 173

172.

WASTE MANAGEMENT OF PENNSYLVANIA, INC.

1121 Bordentown Road  
Morrisville, PA 19067

(215) 736-9400

(215) 736-9475 Laboratory

Document Refer No. 98 94128

NON-HAZARDOUS WASTE MANIFEST

1. Generator of Waste (must be filled in by producer) EPA I.D. No.

Company Name: (Print or Type) Wetco Corp

Pick-up Address 1000 Conover Blvd.  
(No.) (Street)

Port Jervis  
(City)

NY  
(State)

Telephone Number: 908 210-1600

SIC No.

Waste Stream Identification: This manifest represents a non-hazardous waste as per E.P.A. and PA D.E.R. regulations.

Tons: 20 (55)

Cubic Yards:

Other (Specify):

Name of Waste Asphalt

Special Handling Instructions, if any:

PROFILE/WASTE STREAM I.D. NUMBER: 363078

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to applicable state and federal law. The wastes were consigned to the transporter named. I certify that the foregoing is true and correct to the best of my knowledge.

Date: 12/15/99

Signature: [Signature]  
(Name and Title)

2. Hauler of Waste (must be filled in by hauler) EPA I.D. No. NTD0000613477

COMPANY NAME: NAPPI TRUCKING CO.

ADDRESS: 51 MORRISTOWN RD MATAMoras NY 07747

Pick-up Date: 12/16/99

Truck No. 954

Vehicle Lic. No. AA9370A

The above described waste was picked up and hauled by me to the disposal facility named below and was accepted. I certify under penalty of perjury that the foregoing is true and correct.

Signature of authorized agent and title: [Signature]

3. Disposer of Waste (must be filled in by disposer) CIRCLE ONE:

**G.R.O.W.S., INC.**  
1513 Bordentown Road  
Morrisville, PA 19067  
Permit #100148

**T.R.R.F.**  
200 Bordentown Road  
Tullytown, PA 19007  
Permit #101494

Waste subject to this manifest was delivered by the above hauler to this disposal facility and accepted on \_\_\_\_\_ (DISPOSAL DATE)

Signature of authorized agent and title: \_\_\_\_\_

**ENCLOSURE 5**  
**REVISED DEED NOTIFICATION**  
**DECEMBER 7, 1999**



Witco Corporation  
1000 Convery Boulevard  
Perth Amboy, NJ 08862  
(732) 826-6600  
(732) 826-5408 Fax

December 7, 1999

Mr. Gary Lipsius  
New Jersey Department of Environmental Protection  
Division of Responsible Party Site Management  
Bureau of State Case Management  
401 East State Street  
CN 028  
Trenton, NJ 08625

SUBJECT: CERTIFICATION OF SUBMITTAL OF REVISED DEED  
NOTIFICATION CKWITCO CORPORATION, PERTH AMBOY PLANT CLEANUP

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Dear Mr. Lipsius:

In accordance with the requirements for certification of reports per N.J.A.C. 7:26C-1-2, we submit the following, concerning the revised Deed Notification identifying those areas above NJDEP Residential criteria but below site cleanup standard for the Perth Amboy on site PCB remediation work.

"I certify under penalty of law that I have personally examined and am familiar with the information submitted herein and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, to the best of my knowledge, I believe that the submitted information is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of any statute, I am personally liable for the penalties."



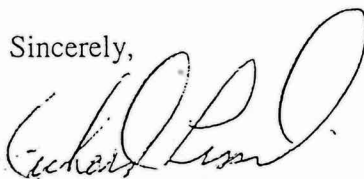
A Company Dedicated To Total Quality

"I certify under penalty of law that I am fully aware of the requirements of N.J.S.A. 58:10B-3 et seq., as they pertain to remediation funding sources. Specifically, I am aware of my responsibilities in the establishment and maintenance of a remediation funding source. Additionally, I acknowledge that this remediation funding source shall be maintained until such time as I have submitted an alternative remediation funding source to the Department and it has been approved by the Department in writing or I have been notified by the Department in writing that I am no longer required to maintain a remediation funding source. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of any statute, I am personally liable for the penalties."

CKWITCO CORPORATION

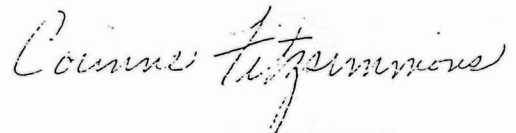
By: Richard P. Lissenden  
Title: Plant Manager

Sincerely,



Richard Lissenden  
Plant Manager  
CKWitco Corporation

NOTARIZATION



CORINNE FITZSIMMONS  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires April 15, 2002



*DEED NOTICE*

IN ACCORDANCE WITH N.J.S.A. 58:10B-13, THIS DOCUMENT IS TO BE  
RECORDED IN THE SAME MANNER AS ARE DEEDS AND OTHER  
INTERESTS IN REAL PROPERTY.

Prepared by:

\_\_\_\_\_

[Signature]

\_\_\_\_\_

[Print name below signature]

Recorded by:

\_\_\_\_\_

[Signature, Officer of County Recording Office ]

\_\_\_\_\_

[Print name below signature]

DEED NOTICE

This Deed Notice is made as of the \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, by CKWitco  
Corporation (together with his/her/its/their successors and assigns, collectively  
"Owner").



WITNESSETH:

WHEREAS, Owner is the owner in fee simple of certain real property designated as the following Blocks and Lots; Block 471 Lot 1; Block 470, Lots 1.01 & 1.02; Block 472.03, Lots 1-13, & 30 & 32-35; and Block 474, Lot 1.01, on the tax map of the City of Perth Amboy, Middlesex County, New Jersey Department of Environmental Protection Known Contaminated Site List Number NJD002165561, more particularly described on Exhibit A attached hereto and made a part hereof (the "Property"); and

WHEREAS, the New Jersey Department of Environmental Protection ("Department") approved a remedial action on June 1, 1995 for NJD002165561/CKWitco Corporation Perth Amboy Site Convery Boulevard concerning the Property in which the Department has approved the use of institutional controls and/or engineering controls in accordance with N.J.S.A. 58:10B-13; and

WHEREAS, this Deed Notice itself is not intended to create any interest in real estate in favor of the Department, nor to create a lien against the Property, but merely is intended to provide record or deed notice of certain conditions and restrictions on the property and to reflect the regulatory and statutory obligations imposed as a condition of using institutional and/or engineering controls; and

WHEREAS, the areas described on Exhibit B attached hereto and made a part hereof (the "Affected Areas") contain contaminants above the applicable remediation standards that would allow for the unrestricted use of the Property; and

WHEREAS, the type, concentration and specific location of the contaminants are described on one or more diagrams, maps and/or tables on Exhibit B attached hereto and made a part hereof; and

WHEREAS, a narrative description of all institutional controls and associated monitoring and maintenance activities are provided in Exhibit C; and

WHEREAS, to prevent the potential for migration of the contaminants and unacceptable risk of exposure to the contamination to humans or the environment, permeable surface covers and asphalt covers are in place at the Property, at the locations shown in Exhibit B on maps titled Figure B-2.1, Figure B-2.2, Figure B-2.3, Figure B-2.4, Figure B-2.5 and Figure B-3; and

WHEREAS, to prevent the potential for unacceptable exposure to the contamination to humans or the environment a liner is in place at the Property, at the locations shown in Exhibit B on the map titled Figure B-2.1; and

WHEREAS, in accordance with the Department's approval of the Remedial Action Work Plan, and in consideration of the terms and conditions of that

approval, and other good and valuable consideration, Owner has agreed to subject the Property to certain statutory and regulatory requirements which impose restrictions upon the use of the Property, and to restrict certain activities at the Property, as set forth below.

NOW, THEREFORE, Owner agrees to the conditions and restrictions listed below and hereby notifies all interested parties, owners, lessees and operators that the applicable regulations and statutes require of such person while owning, leasing or operating the Property as follows:

1. RESTRICTED USES. The owner(s) of all or any fee interest in all or any portion of the Affected Areas and each operator of all or any portion of the Affected Areas, shall not allow any of the following uses of the following portions of the Affected Areas:

<u>Portion of the Affected Area</u>	<u>Restricted Use</u>
The Affected Engineering Control Area as identified in Exhibit B, Figures B-2.1, B-2.2, B-2.3, B-2.4, B-2.5 and B-3.	The use shall be restricted to <i>non-residential uses only and</i> pursuant to Paragraphs 2 and 3.
The Other Affected Areas as identified in Exhibit B, Figure B-3.	

2. EMERGENCIES. In the event of an emergency which presents a significant risk to public health, safety, or the environment, the application of

Paragraph 1 above may be temporarily and unilaterally suspended, by Owner,  
provided that the Owner:

- i. Immediately notifies the Department of the emergency;
- ii. Limits both the actual disturbance and the time needed for the disturbance to the minimum reasonably necessary to adequately respond to the emergency;
- iii. Implements all measures necessary to limit actual or potential, present or future risk of exposure to humans or the environment to the residual contamination; and
- iv. Restores the Affected Areas to the pre-emergency conditions to the extent reasonably possible, and provides a report to the Department of such emergency and restoration efforts within ninety (90) calendar days after the end of the emergency.

### 3. ALTERATIONS, IMPROVEMENTS, AND DISTURBANCES.

(a) Except as provided in Paragraph 2 above, no owner or operator shall make, or allow to be made, any alteration, improvement, or disturbance in, to, or about the Affected Areas which disturbs any engineering control or which creates an unacceptable risk of exposure of humans or the environment to contamination in the Affected Areas without first obtaining the express written consent of the Department. Nothing herein shall constitute a waiver of the Owner's or operator's obligation to comply with all applicable laws and regulations.

(b) Notwithstanding subparagraph 3(a) above, the Department's consent is not required for any alteration, improvement, or disturbance provided the Owner or operator;

i. Provides for restoration of any disturbance of an engineering control to pre-disturbance conditions within sixty (60) calendar days after the initiation of the alteration, improvement or disturbance; and

ii. Does not allow an exposure level above those noted under Restricted Uses, provided that all applicable worker health and safety laws and regulations are followed during the alteration, improvement, or disturbance.

4. ACCESS. While this Deed Notice is in effect, the Owner agrees to allow the Department, its agents and representatives access to the property to inspect and evaluate the continued effectiveness of the institutional or engineering controls and to conduct additional remediation to ensure the protection of the public health and safety and the environment.

5. NOTICE TO LESSEES AND OTHER HOLDERS OF PROPERTY INTERESTS. Owner shall cause all leases, grants, and other written transfers of interest in the Affected Areas to contain a provision expressly requiring all holders thereof to take the Property subject to the restrictions contained herein and to comply with all, and not to violate any of the conditions of this Deed Notice. Nothing contained in this Paragraph shall be construed as limiting any obligation

of Owner to provide any notice required by any law, regulation, or order of any governmental authority.

6. ENFORCEMENT OF VIOLATIONS. The restrictions provided herein may be enforceable solely by the Department against any person who violates this Deed Notice. A violation of this Deed Notice shall not affect the status of the ownership of or title to the Property. To enforce violations of this Deed Notice, the Department may initiate one or more enforcement actions pursuant to N.J.S.A. 58:10-23.11u and, require additional remediation and assess damages pursuant to N.J.S.A. 58:10-23.11g.

7. SEVERABILITY. If any court of competent jurisdiction determines that any provision of this Deed Notice is invalid or unenforceable, such provision shall be deemed to have been modified automatically to conform to the requirements for validity and enforceability as determined by such court. In the event that the provision invalidated is of such a nature that this provision cannot be so modified, the provision shall be deemed deleted from this instrument as though it had never been included herein. In either case, the remaining provisions of this Deed Notice shall remain in full force and effect.

8. SUCCESSORS AND ASSIGNS. This Deed Notice shall be binding upon Owner and upon Owner's successors and assigns while each is an owner or operator of the Property, and the Department.

-Provide written notice to each municipality in which the Property is located, with a copy to the Department, of the removal or change of the restrictions contained herein; or

ii. Issue a written notification of intent to deny the request pursuant to (c) below.

(c) The Department will set forth in a notice of intent to deny a request to modify or terminate this Deed Notice the basis for its decision. The owner can respond to the intent to deny by providing new or additional information or data. The Department will review any such new or additional information or data and issue a final decision to grant or deny the request within sixty (60) calendar days after the Department's receipt of the owner's response.

IN WITNESS WHEREOF, Owner has executed this Deed Notice as of the date first written above.



ATTEST:

CKWitco Corporation

\_\_\_\_\_ By

\_\_\_\_\_

\_\_\_\_\_

[Print name and title]

[Print name and title]

[If Owner is a corporation]

STATE OF NEW JERSEY SS.:

COUNTY OF MIDDLESEX

I certify that on , 19 , [Name of person executing document on behalf of Owner] personally came before me, and this person acknowledged under oath, to my satisfaction, that:

(a) this person is the [secretary/assistant secretary] of [Owner], the corporation named in this document;

(b) this person is the attesting witness to the signing of this document by the proper corporate officer who is the [president/vice president] of the corporation;

(c) this document was signed and delivered by the corporation as its voluntary act and was duly authorized;

(d) this person knows the proper seal of the corporation which was affixed to this document; and

(e) this person signed this proof to attest to the truth of these facts.

\_\_\_\_\_

[Print name and title of attesting witness]

Signed and sworn before me on  
, 19

\_\_\_\_\_, Notary Public

[Print name and title]

## EXHIBIT A

### METES AND BOUNDS DESCRIPTION OF PROPERTY

#### Notes

1. See attached Figure A-1, United States Geological Survey Quadrangle Map, for regional location.
2. See attached Figure A-2, Hagstrom County Map, for site location.
3. See attached tax maps for metes and bounds description of property.

## **EXHIBIT B**

### **DESCRIPTION OF AFFECTED AREAS**

*Note: See attached figures and accompanying notes, including Figure B-1, which serves as a base map for referencing the orientation of Figures B-2.1 through B-2.5 in relation to the Facility and each other, and Figure B-3.*

## EXHIBIT C

### INSTITUTIONAL CONTROLS AND ASSOCIATED MONITORING AND MAINTENANCE ACTIVITIES

There are two types of affected areas identified in the Deed Notice, Affected Engineering Control Areas and Other Areas. Affected Engineering Control Areas have engineering controls in place. The controls consist of a minimum of 2 feet of clean soil cover in the contaminated areas (Figures B-2.1 through B-2.5). In the heater pad area, the clean soil is separated from the contaminated soil at the bottom of the excavation by a PVC liner. At two locations depicted on Figure B-3, asphalt covers have been installed to control exposure to contaminated soil. Other Areas depicted on Figure B-3 have contamination in soil above residential remediation standards but below the remediation standard for the Property. The Other Areas do not have engineering controls in place and exposure will be controlled through use of institutional controls with associated monitoring and maintenance activities.

Any work performed in the contaminated areas designated on Figures B-2.1 through B-2.5 and Figure B-3 will be performed under the guidance of both a health and safety plan and a work plan. These plans will address issues such as personal protective equipment, sampling of excavated material, real-time air monitoring, management of contaminated spoils, erosion control, and site restoration.

The clean soil cover was hydroseeded after installation and the resulting vegetative layer is inspected and maintained regularly. If erosion or loss of cover soil occurs, CKWitco Corporation will replace the soil to maintain the minimum 2-foot thick cover and revegetate to prevent erosion.

CKWitco Corporation operations personnel periodically inspect water collection standpipes in the heater pad area and pump accumulated liquids, as necessary. Cracks or other damage to the concrete caps in the heater pad area will be repaired if they are observed by Facility personnel. In addition, CKWitco Corporation

## **EXHIBIT C**

### **INSTITUTIONAL CONTROLS AND ASSOCIATED MONITORING AND MAINTENANCE ACTIVITIES**

There are two types of affected areas identified in the Deed Notice, Affected Engineering Control Areas and Other Areas. Affected Engineering Control Areas have engineering controls in place. The controls consist of a minimum of 2 feet of clean soil cover in the contaminated areas (Figures B-2.1 through B-2.5). In the heater pad area, the clean soil is separated from the contaminated soil at the bottom of the excavation by a PVC liner. At two locations depicted on Figure B-3, asphalt covers have been installed to control exposure to contaminated soil. Other Areas depicted on Figure B-3 have contamination in soil above residential remediation standards but below the remediation standard for the Property. The Other Areas do not have engineering controls in place and exposure will be controlled through use of institutional controls with associated monitoring and maintenance activities.

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The clean soil cover was hydroseeded after installation and the resulting vegetative layer is inspected and maintained regularly. If erosion or loss of cover soil occurs, CKWitco Corporation will replace the soil to maintain the minimum 2-foot thick cover and revegetate to prevent erosion.

CKWitco Corporation operations personnel periodically inspect water collection standpipes in the heater pad area and pump accumulated liquids, as necessary. Cracks or other damage to the concrete caps in the heater pad area will be repaired if they are observed by Facility personnel. In addition, CKWitco Corporation

operations personnel will periodically inspect the asphalt covers for cracks and loss of integrity. Cracks or damage to asphalt covers will be repaired if they are observed by Facility personnel.

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## NOTE:

1. Designated engineering controlled areas contain residual PCB contamination at levels in excess of the State of New Jersey Non-Residential Direct Contact Soil Cleanup Criteria (=2 PPM). Remaining PCB concentrations are between 2 and 50 ppm. Engineering controls in the form of a clean soil cover with a minimum thickness of 2 feet are in place in areas where the cleanup standard is exceeded; therefore, the minimum depth at which contamination can be encountered is 2 feet.
2. In addition to residual PCB contamination, the rubble pile area located east of the plant contains residual contamination from other pollutants in concentrations that exceed the State of New Jersey Industrial Cleanup Standards. Contaminants in this area include arsenic at a concentration of 62 ppm (cleanup standard = 20 ppm) and benzo(a)pyrene at concentrations ranging from 5.0 to 12.4 ppm (cleanup standard = 0.66 ppm). The engineering control for the rubble pile area is with clean soil cover with a minimum thickness of 2 feet; therefore, the minimum depth at which contamination can be encountered is 2 feet. The maximum depth of excavation with in the rubble pile was 8 ft. bgs.

A

B

C

NOTES:

- 1. Designated engineering controlled areas contain residual PCB contamination at levels in excess of the State of New Jersey Non-Residential Direct Contact Soil Cleanup Criteria (=2 PPM). Remaining PCB concentrations are between 2 and 50 ppm. Engineering controls in the form of a clean soil cover with a minimum thickness of 2 feet are in place in areas where the cleanup standard is exceeded; therefore, the minimum depth at which contamination can be encountered is 2 feet.
- 2. Engineering controls in place in the heater pad area include a clean soil cover with a minimum thickness of 2 feet and a PVC liner that separates the bottom of the excavation from the clean soil cover. PCB concentrations in excess of 50 ppm can be found in minimal quantities in the Heater Pad area. USEPA and NJDEP approved the heater pad remedial action work plan with the understanding that some residual concentrations of PCBs in excess of the 50 ppm criterion would be left within close proximity to building foundations.

A

B

C

D